

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Ralph R. Nelson

Case # 1:04-cv- 10845GAO  
Judge Nathaniel M. Gorton  
Clerk Mr. Mark Barrette

FILED  
CLERK'S OFFICE

2004 JUL 20 P 11: 18

U.S. DISTRICT COURT  
DISTRICT OF MASS

Plaintiff's Plea :

v.

**VENUE IS PROPER**  
**NO CHANGE OF VENUE**

Tonya Marie Coffey (Nelson)

et all

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Venue and Nationwide Service of Process

Under 28 U.S.C 1391(b), a civil RICO action may be brought in the district in which the claim arose. e.g., *Dunn v. Peo*, No 82-c-4133 (N.D. ILL Oct 25,1982), *Farmers Bank of State of Del v. Bell Mortgage Corp.*, 452 F. Supp. 1278, 1280 ( D. Del, 1978)

If venue is proper as to one defendant, the plaintiff may obtain a court order to bring co-conspirators into the action, even though venue as to them would not have been originally appropriate. Under 18 U.S.C 1965 (b), "where it is shown that the ends of justice require that other parties residing in any other district be brought before the court," the court may issue a summons for them and the marshal may serve that summons nationwide. Similarly, subpoenas for witnesses can be served nationwide if the court orders such process "upon a showing of good cause." 18 U.S.C 1965(c).

With deepest sincerity, I ask this court NOT to change the venue. These issues will never get resolved in Ohio. And the consequences of this upon my children will be grave.

### Consider The Brazen Dishonesty

Since their honesty with the Ohio Supreme Court is in question, how can any court in Ohio resolve these issues ?

In February 2002, I asked the Office of Disciplinary Counsel for the Ohio Supreme Court for help. After reviewing my child support payment history the Supreme Court referred to my request as my "accurate protestations." And in a letter from the Supreme Court of Ohio to myself dated January 25, 2002, the council wrote, " We have further been advised that with the most recent proceedings in this matter, Clark County will now be adjusting its record to reflect the true and accurate state of your child support obligation."

Two weeks later, I received a bill in which the Ohio CSEA did not do as they apparently informed the Supreme Court of Ohio that they would do. I responded with a request for a mistake-of-fact hearing, which was not granted.

I have been asking for these issues to be resolved for the past ten years. No problem resolution. All they do is slander my name, and isolate my children from their good Father.

### Consider The Refusal To Take Responsibility

When the Clark County Court of Common Pleas prohibited all contact between my children and their Father, the court referenced in **bold italics** a document from the Clark County CSEA that was proven to be knowingly inaccurate. And to this day, the Ohio CSEA has not returned to the court to inform the court that the court referenced documentation from them that was inaccurate. They have made no attempt to rectify their mistakes. And the affect upon my children has been grave. Again, the response has been to simply slander my name.

### Consider The Abuse That Was Encouraged

When Tonya Marie Coffey (Nelson) filed another knowingly dishonest arrearage charge against me in the Clark County Common Pleas Court, and I made one of eleven trips out to Ohio to defend myself, only to have Tonya Marie Coffey (Nelson) withdraw the charge upon my arrival. Damage Done. This was abusive behavior. Plain and simple. Abusive behavior that the court could have, and should have easily stopped.

Obviously, if this case is moved to Ohio, this abuse will continue, and there will be no problem resolution. Any hope of problem resolution resides in Boston.

The Clark County Common Pleas Court was nothing but abusive towards me, insulting towards me, degrading towards me, and slandering towards me. No human being should be treated in the humiliating fashion in which I was treated. There could never be any problem resolution occurring at the Clark County Common Pleas Court.

The Clark County Common Pleas Court was very dishonest.

Consider My Physical Safety.

When Tonya Marie Coffey (Nelson's) father took the stand in the Clark County Common Pleas Court, the first question he was asked by attorney Knapp was, "Do you consider yourself to be a violent person?" To which he responded, "YES, I consider myself to be a violent person!" This is the same individual who, one more than one occasion attempted to be physically abusive towards me, in the presence of my two youngest children. And it was only my strong character that prevented a very grave situation from escalating. This is the same individual who locked my daughter in his truck. This is the same individual who according to his daughter has committed some horrifically violent crimes.

I faced this intimidation when I made eleven trips out to Ohio to try to help my children. And all eleven times, there was no conflict resolution. Only continued slander of my name.

Consider The Unaccountability

Consider all the crimes Tonya Marie Coffey (Nelson) has committed. All the hurt she has inflicted upon the children. And she has never been held accountable for her actions by anyone in Ohio. I once mentioned to two attorneys in Ohio when I was feeling particularly despondent over missing my children, that I felt as though Tonya could walk into a local bank, shoot the bank manager, steal the money, and the people in Ohio would somehow hold me responsible. And both attorneys agreed with my assessment of the situation. And all indications point to this situation not changing.

So I plead with this court - I can not give up on my children - I promised them - but I can't help them in Ohio. The ONLY venue option is Boston.

Thank You.

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